

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ROTATABLE TECHNOLOGIES LLC,

Plaintiff,

v.

NOKIA INC. ET AL.,

Defendants.

CIVIL ACTION NO.2:12-CV-265

**JURY TRIAL DEMANDED
CONSOLIDATED**

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to local Patent Rule 4-3 of the United States District Court for the Eastern District of Texas and the Court's Docket Control Order dated September 17, 2012, Plaintiff Rotatable Technologies LLC ("Rotatable"), and consolidated Defendants Apple Inc. ("Apple"), Samsung Telecommunications America, LLC and Samsung Electronics America, Inc. (collectively "Samsung"), Quickoffice, Inc. ("Quickoffice"), and Motorola Mobility LLC. ("Motorola") (collectively "Defendants") file this Joint Claim Construction and Prehearing Statement. Plaintiff and Defendants will be addressing the claim terms of asserted U.S. Patent No. 6,326,978 ("the '978 Patent").

A. Agreed Upon and Disputed Claim Terms, Phrases or Clauses (P.R. 4-3(a)).

There are no claim terms, phrases, or clauses on which the parties agree.

B. Disputed Claim Terms (P.R. 4-3(b)).

Pursuant to Local Patent Rule 4-3(b), the chart attached as Exhibit A to this Joint Statement contain Rotatable's and Defendants' respective proposed constructions and supporting evidence for each disputed claim term, phrase, or clause of the '978 patent.

C. Anticipated Length of Time for Claim Construction Hearing (P.R. 4-3(c)).

The parties have met and conferred in good faith regarding the constructions of terms and have narrowed the issues for this Court to resolve. Plaintiff anticipates that the hearing will last for approximately 3 hours. Defendants anticipate that the hearing will last for approximately 4 hours (2 hours per side).

D. Witnesses and Experts (P.R. 4-3(d))

The Parties do not intend to call any witnesses at the hearing. The Parties do not believe a technical expert is required to define the disputed claim terms. Neither Plaintiff nor Defendants identified any expert testimony as extrinsic evidence.

E. Other Issues (P.R. 4-3 (e)).

The parties are not aware of any other issues.

April 22, 2013	Respectfully submitted, <u>\s\ Timothy T. Wang</u> Hao Ni Texas Bar No. 24047205 hni@nilawfirm.com Timothy T. Wang Texas Bar No. 24067927 twang@nilawfirm.com Stevenson Moore V Texas Bar No. 24076573 smoore@nilawfirm.com Ni, Wang & Associates, PLLC 8140 Walnut Hill Ln., Ste. 310 Dallas, TX 75231 Telephone: 972.331.4600 Fax: 972.314.0900 ATTORNEYS FOR PLAINTIFF ROTATABLE TECHNOLOGIES LLC
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April 22, 2013	<p><i>s/ Jesse J. Jenner, with permission by Michael E. Jones</i></p> <p>Michael E. Jones State Bar No. 10929400 POTTER MINTON P.C. 110 N. College, Suite 500 Tyler, Texas 75702 Telephone: (903) 597-8311 Facsimile: (903) 593-0846 mikejones@potterminton.com</p> <p>Of Counsel Jesse J. Jenner (pro hac vice) Gene W. Lee (pro hac vice) David Chun (pro hac vice) ROPES & GRAY, LLP 1211 Avenue of the Americas New York, NY 10036 Telephone: (212) 596-9000 Facsimile: (212) 596-9090 Jesse.Jenner@ropesgray.com Gene.Lee@ropesgray.com David.Chun@ropesgray.com Attorneys for Defendants</p> <p>ATTORNEYS FOR DEFENDANTS</p>

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April 22, 2013	<p><i>/s/ Michael E. Jones</i> Michael E. Jones State Bar No. 10929400 mikejones@potterminton.com POTTER MINTON A Professional Corporation 110 N. College, Suite 500 Tyler, Texas 75702 Tel: (903) 597-8311 Fax: (903) 593-0846</p> <p>Roderick M. Thompson (CA SBN 96192) rthompson@fbm.com Eugene Mar (CA SBN 227071) emar@fbm.com Daniel C. Callaway (CA SBN 262675) dcallaway@fbm.com Cathleen G. Garrigan (CA SBN 254300) cgarrigan@fbm.com Farella Braun + Martel LLP 235 Montgomery Street, 17th Floor San Francisco, CA 94104 Telephone: (415) 954-4400 Facsimile: (415) 954-4480</p> <p>ATTORNEYS FOR DEFENDANTS QUICKOFFICE, INC. AND MOTOROLA MOBILITY LLC</p>

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile, and/or first class mail on this date.

/s/ Timothy T. Wang
Timothy T. Wang